

MTCA/SMS INTEGRATION TERMS & DEFINITIONS

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TERMINOLOGY

MAL – I do like the term “maximum allowable level” as opposed to “minimum cleanup level”. I believe the use of the “minimum” has created confusion since the beginning, as if that’s the lowest it could be. I agree with others that “MAL” isn’t necessarily the best acronym, but not sure what to propose in its place. I also like that the timeframe and use of the term “active cleanup action” has been removed from its definition. It should be a simple concentration, with a timeframe and point of compliance added later.

Timeframe – As I mentioned at the meeting, I am not sure that references to 10 years in the rule as a cleanup timeframe are helpful. That was an experiment based on our best scientific guess at the time, and it hasn’t been borne out. For simple benthic cleanups (e.g., capping) where restoration of the benthic community is the goal, 3-5 years is a more appropriate and doable goal for restoration. For the bioaccumulation-based cleanups we’re talking about now, if stormwater and other non-point sources get into the mix of things that have to be reduced, decades may not be enough. Having 10 years and then exceptions to 10 years seems like unnecessary complexity in the rule, which we should be reducing whenever we can. Not sure what to recommend in its place – maybe a timeframe selected by the site manager based on a set of considerations, with more discussion in the SAPA or SCUM2?

Bioassay – Strongly prefer the “current term,” as indicated in our handouts.

Chronic and Acute Bioassays – Prefer the “new definitions” eliminating the portions identified as “potential discards”.

Sediment – Good improvements to this definition. Still not sure about the 6-week part. Could just state that it includes ephemeral streambeds.

Surface Sediment and Contaminated Sediment – New definitions are good.

Active cleanup action – If we still need this, agree with the change.

Biologically active zone – Still need more specificity on “the majority of”. Contact Pete Striplin and/or Nancy Musgrove for their opinions.

Remediation levels – The rule should allow for the possibility that remediation levels will be below cleanup levels if cleanup to native sediments is conducted (not an uncommon strategy, will be more so when bioaccumulation gets into the mix). In this case, the native sediments are characterized and post-cleanup monitoring is conducted to ensure that the native layer has been reached. However, these concentrations may be above or below your cleanup levels/standards (probably below benthic and may be above bioaccumulative).

Framework – The framework presented for the various cleanup levels etc. makes sense as well as meeting the goal of consistency with MTCA.